



# Iowa Department of Human Services

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## INFORMATIONAL LETTER NO.1454

**DATE:** November 24, 2014

**TO:** Iowa Medicaid Home Health and Physician Providers

**FROM:** Iowa Department of Human Services, Iowa Medicaid Enterprise (IME)

**RE:** Physician Face to Face Encounter Changes for the Home Health Services (HHS) and Private Duty Nursing/Personal Cares (PDN/PC) Programs

**EFFECTIVE:** January 1, 2015

As a condition for payment for the home health benefit, section 6407 of the Affordable Care Act (ACA) requires that a physician or an allowed non-physician practitioner complete a face-to-face member encounter. The face-to-face encounter is a component of the physician certification process for the home health benefit. It documents the primary medical basis for the benefit service(s). The intent of this ACA provision is to achieve greater physician accountability in certifying a member's eligibility for the home health benefit and establishing a member's home health plan of care. Home Health agencies providing services under the HHS or PDN/PC programs were required to comply with the face-to-face encounter effective July 1, 2011.

Three primary changes to the face-to-face requirements were published as final rules in the Federal Register, Vol. 79, No. 215, dated November 6, 2014. In accordance with the federal final rules, these changes will be effective January 1, 2015, for physician or allowed non-physician practitioners certifying the home health benefit for the HHS or PDN/PC program services.

The following chart compares the current face-to-face encounter requirements to the changes that will become effective January 1, 2015.

<b>COMPARISON PHYSICIAN FACE-TO-FACE ENCOUNTER REQUIREMENTS</b>	
<b>CURRENT</b>	<b>EFFECTIVE JANUARY 1, 2015</b>
Written narrative of the clinical findings of the face-to-face encounter that supports the provision of the member's home health benefit.	Written narrative requirement removed. (The date(s) of the encounter and physician signature remain as requirements).

Written narrative on the home health certification form provides documentation of the member's medical need and the direct relation to the home health benefit. Home Health agency maintains face-to-face certification narrative in the member medical record.	The physician retains the medical documentation supporting the medical need and the direct relation to the home health benefit in the member's medical record. The physician provides the documentation to the Home Health agency upon request. Reimbursement for services is contingent upon adequacy of physician medical documentation.
Applies to initial certification only.	Applies to all certifications initiated with the completion of a Start-of Care Outcome and Assessment Information Set (OASIS).

Discussion and guidance regarding these changes can be found on the [Centers for Medicare and Medicaid Services \(CMS\)](#) website.

If you have any questions, please contact the IME Provider Services Unit at (800) 338-7909, locally in the Des Moines area at (515) 256-4609, or by email at [imeproviderservices@dhs.state.ia.us](mailto:imeproviderservices@dhs.state.ia.us).